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Attorneys for ANNA “TASHA” MCKENZIE

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ANNA “TASHA” MCKENZIE,  
an Individual,

Plaintiff,

v.

AMAZON.COM SERVICES LLC,  
a foreign limited liability company,

Defendant.

Case No. 2:24-cv-00262-APG-NJK

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFF’S  
RESPONSE TO DEFENDANT’S  
PARTIAL MOTION TO DISMISS  
PLAINTIFF’S FIRST AMENDED  
COMPLAINT**

**(SECOND REQUEST)**

Pursuant to LR IA 6-1, LR IA 6-2 and LR 7-1, Plaintiff Anna “Tasha” McKenzie (“Plaintiff”) and Defendant Amazon.com Services LLC, (“Defendant”) (collectively “the Parties”), by and through their respective counsel of record, hereby request and stipulate to extend the time for Plaintiff to respond to Defendant’s Partial Motion to Dismiss Plaintiff’s First Amended Complaint (“Motion”) (ECF No. 27), which was filed on April

12, 2024. Plaintiff's Opposition to Defendant's Partial Motion to Dismiss would be due on April 26, 2024. The Parties previously stipulated to an extension of time allowing Plaintiff to file an opposition by May 21, 2024, which the Court granted. The Parties now seek a second request for an extension of time to file an opposition to Defendant's Partial Motion to Dismiss Plaintiff's First Amended Complaint because further time is needed to evaluate a settlement demand. The Parties have discussed and agreed to a second extension to Tuesday, **June 4, 2024**, from the current deadline on May 21, 2024, and now request this Court's approval.

The extension is requested for the sake of conserving private and judicial resources, as there is a pending settlement demand being considered by Defendant Amazon.

In the meantime, in order to facilitate settlement, the Parties have granted mutual extensions for pending discovery and also agreed to this stipulation to a second extension of time for Plaintiff to file an Opposition to Defendant's Partial Motion to Dismiss.

This request for extension to June 4, 2024, is made in good faith and is intended to conserve both private and judicial resources and because it will facilitate potential settlement. Without an extension, the current settlement will be threatened.

DATED: May 10, 2024

HKM EMPLOYMENT ATTORNEYS LLP

By: /s/ Rebecca Rojas

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5 DATED: May 10, 2024

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15 AMAZON.COM SERVICES LLC

16  
17  
18 **ORDER**

19  
20 IT IS SO ORDERED.

21 

22  
23 UNITED STATES DISTRICT JUDGE

24 DATED: May 13, 2024